

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIA ROSSI, individually, and on behalf of)	
all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-05090
)	
CLAIRE’S STORES, INC., CBI)	Honorable Andrea R. Wood
DISTRIBUTING CORP.,)	
)	
Defendants.)	

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Claire’s Stores, Inc. and CBI Distributing Corp. (collectively, “Claire’s”), respectfully move this Court to extend the deadline for Claire’s to answer or otherwise respond to Plaintiff’s Class Action Complaint (Doc. 4-1) (“Complaint”) by 28 days, up to and including October 2, 2020. In support of its unopposed motion, Claire’s states:

1. Plaintiff Julia Rossi (“Plaintiff”) filed her Complaint on July 31, 2020, in the Circuit Court of Cook County, Illinois. Claire’s was served with the summons and Complaint on August 4, 2020.
2. On August 28, 2020, Claire’s removed this matter to the United States District Court for the Northern District of Illinois under the Class Action Fairness Act.
3. Per Federal Rule of Civil Procedure 81(c)(2), “A defendant who did not answer before removal must answer or present other defenses or objections under these rules within . . . 7 days after the notice of removal is filed.” Fed. R. Civ. P. 81(c)(2).

4. Claire's did not answer or otherwise plead before this matter was removed to federal court, and therefore, the deadline for Claire's to answer or otherwise respond to the Complaint currently is September 4, 2020.

5. In the Complaint, Plaintiff alleges that the personal information of "many thousands of individuals throughout the United States" was compromised during a cyberattack on Claire's e-commerce platform earlier this year. (Compl., ¶¶ 17, 72-73.) Plaintiff asserts various common law and statutory claims under both Illinois and Pennsylvania laws and seeks certification of a nationwide class and a Pennsylvania sub-class. (*Id.*, ¶¶ 72, 79-163.)

6. Given the complexity and nature of Plaintiff's claims, Claire's respectfully requests an additional twenty-eight days, up to and including October 2, 2020, to file its responsive pleading.

7. Claire's conferred with Plaintiff's counsel in good faith prior to filing this motion, and Plaintiff consents to Claire's requested extension.

8. This is Claire's first request for an extension of time.

9. Claire's expressly reserves the right to raise all defenses it has to the Complaint.

WHEREFORE, Defendants Claire's Stores, Inc. and CBI Distributing Corp. respectfully request that this Court extend the deadline to answer or otherwise respond to Plaintiff's Complaint by 28 days, up to and including October 2, 2020.

Dated: September 1, 2020

Respectfully submitted,

/s/ Maria A. Boelen

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I, John Letchinger, certify that on the 1st day of September 2020, the foregoing *Unopposed Motion to Extend Time to Answer or Otherwise Respond to Plaintiff's Complaint*, was served via email on the following:

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/s/ Maria A. Boelen

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